



IV.D. Narrative Information Sheet

1. Applicant Identification-

Montgomery County Land Reutilization Corporation
130 West Second Street, Suite 1425
Dayton, Ohio 45402

2. Funding Requested-

a. Assessment Grant Type- Site-Specific

b. Federal Funds Requested

i. \$200,000

ii. The Land Bank is not requesting a Site-Specific Assessment Grant waiver of the \$200,000 limit.

c. Contamination-

\$200,000 Hazardous Substances

3. Location-

- a. West Carrollton
- b. Montgomery County
- c. Ohio

4. Property Information for Site-Specific Applications-

Former Appvion Wastewater Treatment Plant
4000 Hydraulic Road
West Carrollton, Montgomery County, Ohio 45449

5. Contacts

a. Project Director

Mike Grauwelman, Executive Director
(937) 531-6921
MikeG@MCLandBank.com
Montgomery County Land Bank
130 West Second Street
Dayton, Ohio 45402

b. Chief Executive/Highest Ranking Elected Official

Mike Grauwelman, Executive Director
(937) 531-6921
MikeG@MCLandBank.com
Montgomery County Land Bank
130 West Second Street
Dayton, Ohio 45402

IV.D.6. Population-

Population of Montgomery County: 532,331

Population of city of West Carrollton: 13,143



LAND BANK

IV.D.7. Other Factors Checklist – put in the description within the narrative on a certain page

Other Factors	Page #
Community population is 10,000 or less.	
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The priority brownfield site(s) is impacted by mine-scarred land.	
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	p.1
The priority site(s) is in a federally designated flood plain.	p.1
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or will incorporate energy efficiency measures.	
30% or more of the overall project budget will be spent on eligible reuse planning activities for priority brownfield site(s) within the target area.	



Mike DeWine, Governor
Jon Husted, Lt. Governor
Laurie A. Stevenson, Director

October 31, 2019

U.S. Environmental Protection
Agency, Region 5
ATTN: Matt Didier
77 West Jackson Boulevard
Mail Code SB-5J
Chicago, IL 60604-3507

Re: **General Correspondence**
Brownfield
Montgomery County

Subject: Montgomery County Land Bank Assessment Grant Proposal

Dear Mr. Didier:

I am pleased to offer Ohio Environmental Protection Agency's (Ohio EPA) support for the Montgomery County Land Bank Assessment Grant Proposal. The Land Bank is applying for a site-specific assessment grant totaling \$200,000 to be used to assess the former Appvion Wastewater Treatment Plant, located at 4000 Hydraulic Road, West Carrollton, Ohio.

The former Appvion Wastewater Treatment Plant was constructed in 1960. The 27.209-acre treatment plant was utilized to process paper wastewater and PCB contaminated paper sludge was deposited in the southern portions of the property. PCB contaminated slurry water may have been processed throughout two former slurry pits in the northern portion of the property. If awarded, the grant funds would be used to assess and characterize the property for PCB contamination and to determine future remedial needs prior to redevelopment. This assessment, along with an eventual clean-up, would help to revitalize the area with a sports complex to be utilized by the City of West Carrollton, as well as neighboring communities, and would benefit the overall health and welfare of the surrounding community.

We look forward to working with the Montgomery County Land Bank and U.S. EPA on this project. If you have any questions, please do not hesitate to contact me at 614-644-2295 or via e-mail at Lisa.Shook@epa.ohio.gov.

Sincerely,

Lisa Shook, Manager
VAP, Enforcement, Remediation & Brownfields Section
Ohio Environmental Protection Agency

ec: Clara Tiffany, MAK Solve, LLC
Mike Starkey, Ohio EPA, DERR/SWDO

1. Project Area Description and Plans for Revitalization - 1.a. Target Area and Brownfields

1.a.i. Background and Description of Target Area The area of West Carrollton was settled in 1797 and incorporated as a village in 1887. The development of West Carrollton was the result of good access to transportation facilities such as the railroad and waterways. West Carrollton industry was founded by several paper mills starting in the late 1800s. The entire Dayton area, located in Montgomery County, Ohio, was the hub of paper manufacturing for over a century. For approximately the next 100 years the community would be known as “The Paper City” until sadly, the demand for paper and changes within the paper industry led to a massive departure of the paper industry from West Carrollton. Unfortunately, as the economy changed the paper companies consolidated and reduced their footprint in the Dayton area, including the suburb of West Carrollton. West Carrollton was a vibrant village/city (city status received in 1967) with a population rooted in the manufacturing industry – the paper mills and other companies associated with the auto industry as General Motors had a large-scale plant nearby. Much of the West Carrollton community over the years worked and lived within the city limits. Currently, West Carrollton is a community approximately eight miles southwest of Dayton, Ohio and 50 miles north of Cincinnati, Ohio. West Carrollton is located adjacent to Interstate 75 and is therefore easily accessible to the entire Miami-Valley region. Owing to the city’s location on the Great Miami River and the Miami-Erie Canal as well as the area’s extensive underground aquifer, the city became a primary location for a burgeoning paper mill industry given the close proximity to an abundant source of fresh water required for the manufacture of paper. Many vestiges of the paper industry remain within the West Carrollton and the redevelopment of those sites have by default become the financial responsibility of the municipality.

1.a.ii Description of the Priority Brownfield Site(s) The site, former waste-water treatment plant (WWTP), was constructed in 1960 and historically used by Appleton Paper (now Appvion Corporation) as a paper sludge and slurry treatment facility. The WWTP was taken out of operation in 2013 by Appvion and has fallen into disrepair. It is an abandoned, unused parcel of land. Although the entirety of the subject property is bound by a chain-link fence with access to the premises via a pad-locked gate and control arm used for traffic control along its eastern border with Hydraulic Road, the location is precarious due to its size, lack of security, adequate surveillance and proximity to neighborhoods and population centers of West Carrollton. There are also deteriorating buildings on the property that although secure, pose a hazard risk. The site consists of an irregular-shaped parcel of land, located within the northern boundaries of West Carrollton, within the flood plain of and adjacent to the Great Miami River. The property totals approximately 27.2-acres and includes several concrete block structures, primary and secondary clarification vessels, aeration lagoons (Pits 1 & 2) and a polishing basin, along with the associated infrastructure including piping, pumps and paving. After treatment, processed water was discharged to the Great Miami River under National Pollution Discharge Elimination System (NPDES) permit 11A00004*MD.

In 2001, Environmental Resources Management (ERM) was retained by Godfrey & Kahn, S.C. for a Phase I Environmental Site Assessment (PIESA) for the purposes of providing legal advice to Paperweight Development Corp. who was considering acquisition of the property. ERM found the recognized environmental conditions - that the southeast portion of the property had been used as a disposal site for various materials containing hazardous substances. Sludge, containing hazardous substances, from wastewater treatment was used as fill around the clarifiers; and the

lagoons had not been lined with clay to engineering standards so that wastewater may have migrated from the lagoons to groundwater. An additional PIESA conducted in 2015 by Gardener and Owens Associates, LLC, for the city of West Carrollton referenced polychlorinated biphenyl (PCB) contamination on the property from the ERM PIESA as a recognized environmental condition.

This site is a priority because as a result of de-inking carbonless paper at the West Carrollton paper mill through the early 1970s, PCB contaminated waste water was generated and processed at the WWTP. The resulting sludge was deposited for a time in the southern one-third of the subject property (Pit 3), releasing PCBs into the surrounding soils. Physical hazards abound within the facility, including large and deep water filled clarifiers, falling and tripping hazards within the on-site structures and the large, open, water filled pits. Environmental exposure hazards are prevalent, primarily in Pit 3, which is in closest proximity to the adjoining residential neighborhood. PCBs have been documented at concentrations ranging from approximately 400 milligrams per kilogram (mg/kg) within the near surface soils (0'-4') to 6,600 mg/kg (10'-20').

1.b. Revitalization of the Target Area - 1.b.i. Redevelopment Strategy and Alignment with Revitalization Plans The reuse strategy for the former WWTP is to develop a regional soccer facility to support youth soccer in the Dayton Standard Metropolitan Statistical Area (SMSA). This will allow expansion of park/green space located to the southwest as well as incorporating the agricultural lands to the west to create a larger more diverse area. It is expected that the design of the facility will incorporate the local Great Miami River Bike Trail, which passes along the northern edge of the property, accommodating walkers, runners and cyclists. Participating in functions at the complex will increase the flow of traffic through the areas of West Carrollton that are being revitalized through other means as part of an overall city-wide planning initiative.

The intent is to utilize the redeveloped property as the foundation for a destination soccer complex that would serve as the host site for regional youth soccer tournaments. According to the Montgomery County, Ohio Convention and Visitors Bureau, youth soccer events account for five of the top 15 tourism events in the local market area. However, there is not a single-site facility in the area that has the capacity to host a regional tournament event. As a result, youth soccer tournaments are forced to use a patchwork of soccer fields that often requires long distance travel between games, inconsistency of soccer field playing conditions and ultimately limits the ability to grow tourism opportunities.

This development of a regional soccer facility in West Carrollton is perfectly aligned with the city's revitalization plans. The overarching goal of the West Carrollton City Council is to establish West Carrollton as a regional destination location. The method for accomplishing this goal is to utilize sports and recreation. Currently, West Carrollton is engaged in a redevelopment of a primary transportation corridor known as Central Avenue. The proposed target brownfield site is one mile from Central Avenue corridor. Current sports related projects occurring along the corridor include private sector construction of a year-round indoor/outdoor sand volleyball facility, public bikeway development and city land acquisition adjacent to both the Central Avenue corridor and the Great Miami River for riverfront development to include sports related uses.

1.b.ii. Outcomes and Benefits of Redevelopment Strategy Expected outcomes and benefits of West Carrollton's redevelopment strategy include enhanced tourism opportunities for the Dayton SMSA, creation and expansion of current recreational opportunities for West Carrollton citizens and the entire Dayton SMSA as well as an opportunity for new investment from the private sector.

The most apparent benefit will be the elimination of a blighting, potentially dangerous, non-productive and environmentally tainted former industrial facility from the West Carrollton community. This outcome alone serves as sufficient justification for undertaking the assessment and remediation effort. The benefit of its reuse as a greenspace and soccer complex provides many upsides, including:

- A regional youth sports facility, a use which dovetails with our broader redevelopment strategy for the community of becoming the "go-to" place in the region for sports related activities.
- Creation of a solid foundation to support desired tourism related economic development including services and amenities like hotels, restaurants, retail and public gathering space.
- Facilitating recreational development of the adjacent river corridor and regional bikeway.

Currently, the former WWTP is a blighting influence upon the landscape. The property is environmentally tainted with PCBs caused by the former industrial occupant. The property needs attention on multiple levels in order to eliminate its blighting influence. However, many of the activities required to eliminate the blight, cannot occur until after the environmental assessment has been completed, an environmental remediation plan is defined and then executed.

The site is dangerous. As a former paper waste water treatment facility, there are multiple open lagoon pits, which are deep and wide and hold stagnant water. Given the site's close proximity to a residential neighborhood, the pits pose a potential danger for children, adults and domestic pets. The property perimeter is currently secured by a chain link fence complete with barbed wire. The fence will remain in place until the pits are ultimately filled in with clean fill. The fill process will take multiple years to complete due to the sheer volume of material needed to fill in the open lagoons.

1.c. Strategy for Leveraging Resources - 1.c.i. Resources Needed for Site Reuse

The city of West Carrollton is committed to assisting the Land Bank by leveraging resources that will include but are not be limited to:

- | | |
|---|--|
| • USEPA Funds – Assessment and Remediation Planning | • Local, Regional and State Economic Development Funds - Reuse |
| • OEPA Funds - Remediation | • State Capital Budget - Reuse |
| • TIF Resources - Reuse | • Local Building Trades Training Program - Reclamation |
| • Municipal Resources - Reuse | |

There are multiple aspects to the redevelopment of the former WWTP. Upon completing the environmental site assessment and remediation, the next major phase of the project will include demolition of existing structures on the subject property and reclamation of large open pits on the property. Finally, we will bring the necessary organizations and financial resources to accomplish the development of the regional soccer complex. West Carrollton is well-versed in

developing and managing complex economic development and infrastructure projects that are strategic, aggressive and opportunistic regarding project development. We participate in multiple forums at the local, state and national level and are confident that we will define and leverage the necessary resources to accomplish this redevelopment project.

1.c.ii. Use of Existing Infrastructure Existing Infrastructure is currently in place to support immediate redevelopment of the subject property. The property can be accessed via municipal streets. Water, sewer, electric and natural gas are located either on or immediately adjacent to the property. The property is in close proximity to Interstate 75 and major arterial thoroughfares.

2. Community Need and Community Engagement - 2.a.i. Community's Need for Funding

West Carrollton is a small suburb approximately eight miles southwest of Dayton, Ohio. According to 2010 US Census data the population of West Carrollton is 13,143 with only 5980 households. The Median Age for Head of Households is 52 years, the Median Household Income is approximately \$39,335 and is in the lower tier of household incomes within the Dayton SMSA. West Carrollton has steadily been losing industry and as a result, payroll tax income over a twenty-year period. In large part, this is due to the diminishment of the paper manufacturing industry that was once predominant in the community. West Carrollton was nicknamed “The Paper city”, a slogan which until recently was proudly displayed on the city emblem for many years.

Unfortunately, the paper industry, which fueled so much of West Carrollton’s early growth dating back to the 1870s, has recently contributed to much of its economic decline. In addition to the closure of the Fraser Co. mill (300 jobs lost), the Ahlstrom Paper Mill relocated operations (110 jobs lost) and the 83-acre Appleton Paper Mill outsourced most of its operation in 2012 (330 jobs lost.) These losses in the paper industry have combined with other recent industrial and corporate closures in the city including Johnson Controls (GM supplier) (550 jobs lost), Motoman (robotics) (300 jobs moved), Woody’s Market (regional grocery store) (250 jobs lost) and Roberd’s Furniture corporate headquarters (200 jobs lost). Equally as significant was the closure of the 4.1 million square foot General Motors Auto Assembly Plant one mile east of West Carrollton in the city of Moraine, which resulted in 2170 persons being laid off. According to a University of Michigan study, the event led to the loss of 33,024 jobs directly or indirectly associated with the plant shutdown, with a total impact on the regional economy in Dayton, Ohio, estimated at \$705,250,000. For a small community comprising just 6.4 square miles, these losses have devastated this formerly thriving area.

The U.S. EPA Site Specific Assessment that we are applying for was owned and operated by a prominent paper manufacturer that has taken jobs from the area. Without the financial assistance provided by the assessment grant the Land Bank will not be able to undertake the necessary site assessment and subsequent remediation activities.

	West Carrollton	Montgomery County
Poverty Rate	19.0%	11.8%
Median Income	\$39,335	\$57,652
Owner Occupied Housing	53.1%	63.8%
Median Value Owner Occupied Homes	\$96,500	\$193,500

2.a.ii. Threats to Sensitive Populations We can make the conclusion, per U.S. Census Bureau Quick Facts, that the factors affecting the sensitive low-income population in neighborhoods adjacent to the priority site as compared to the balance of Montgomery County, Ohio, include the citizens are lagging substantially behind on all of the referenced indicators of wealth referenced above. This disparity can be partially attributed to the blighted conditions resulting from the abandoned paper manufacturing infrastructure remnants which includes the former WWTP.

The former WWTP poses a direct threat to the local population. In addition to the abandoned building structures on the property, there are two extremely large and deep open canals that were utilized in the wastewater treatment process. The canals are between 600 and 1000 feet long, 120 feet wide and 15 feet deep. The open canals do hold water and pose a drowning threat to anyone that may trespass upon the property. While the perimeter of the property is secured by a chain link fence, the city cannot absolutely guarantee that the property is inaccessible to trespassers. Of particular concern is that there are a number of children in the area and a city park in close proximity. Until the property can be assessed and remediated the canals cannot be filled.

2.b. Community Engagement - 2.b.i. West Carrollton is fully committed to the concept of Community Engagement with respect to the assessment, cleanup and reutilization of the former WWTP. It is West Carrollton's intent to engage and solicit the community's input through a variety of means including but not limited to the following:

- Quarterly Community Newsletter that is distributed to every household
- Cable Access Television Programming
- Neighborhood Meetings
- Newspaper Articles
- Municipal Legislation

West Carrollton is eager and enthusiastic to assess and remediate the former WWTP. While currently an eyesore, the Land Bank in conjunction with West Carrollton, has a vision for the property that will provide a quality recreational opportunity for tens of thousands of children, serve as a tourism magnet for West Carrollton and the entire Miami Valley region and become a source of community pride and a cornerstone of our community revitalization effort.

2.b.ii. Project Partner Roles

Partner Name	Point of Contact (Name, Email and Phone)	Specific Role in the Project
Miami Conservancy District (MCD)	Amanda Phillips, MCD Assistant Property Manager, aphillips@mcdwater.org, 937-223-1278 x3203	Attend project meetings, provide input on park/greenspace design and potential impacts to the surrounding District land during planning and redevelopment phases, add area to MCD "Way Findings" along Great Miami River
Montgomery County Convention and Visitors Bureau	Ron Eifert, Sports Marketing Director	The Montgomery County, Ohio Convention and Visitors Bureau promotes and facilitates travel and tourism in the Dayton, Ohio Metropolitan Area. The MCCVB will assist the city of West Carrollton in promoting West Carrollton sports-based recreational opportunities.

3. Task Descriptions, Cost Estimates, and Measuring Progress - 3.a. Description of Tasks/Activities and Outputs The ultimate goal of the Land Bank and West Carrollton is to remediate the issues surrounding the existence of PCBs at the former WWTP. Accomplishing this goal is predicated on the completion of a thorough assessment and characterization of PCBs throughout the property.

Task 1, Site Assessment: The Land Bank will task the city of West Carrollton to retain a qualified environmental consultant, experienced in the methods and protocols of sub-surface investigations in accordance with generally accepted standards and practices, as outlined in ASTM E1903-11. The environmental consultant will be tasked with coordinating with the United States Environmental Protection Agency (U.S. EPA), Region 5 Resource Conservation and Recovery Act (RCRA) Corrective Action Section concerning assessment and characterization protocol. Utilizing the sampling protocol outlined in 40 CFR 761 combined with the Incremental Sampling Methodology (ISM) at PCB Cleanup Sites (US EPA, 2019) and the PCB Facility Approval Streamlining Toolbox, a subsurface soil and groundwater investigation will be executed to achieve a risk-based approval of alternate cleanup and disposal methods. It is anticipated that Task 1 will be completed within one calendar year.

Task 2, Remediation Planning: Remediation Planning will include investigating the costs associated with various remedial technologies, planning feasibility studies and the preparation of remedial documents and risk assessments. Preliminary plans will be compiled to incorporate potential engineering and/or institutional controls into the final design of the redevelopment. The city of West Carrollton will coordinate the remedial planning, relying on environmental consultants and applicable sub-contractors.

Task 3, Project Management / Oversight: The Land Bank will lead and coordinate project management and oversight of the grant and Tasks 1 & 2. Programmatic tasks will be managed by West Carrollton, who will interface with the environmental consultants and act as a liaison between the public and the consultants.

3.b. Cost Estimates

Task 1, Site Assessment (\$162,000): Due to the heterogeneous nature of the PCB contamination, an extensive Phase II Environmental Site Assessment following the Incremental Sampling Methodology (ISM) will be conducted to fully characterize the subject property. Up to 200 soil borings and 1,400 soil samples are anticipated. This effort is projected to encompass 28 days, spread over an approximately 5-6-month time period.

Contractual costs to include: Field Geologist time to oversee the drilling, collect and submit all samples, document field activities are expected to be \$20,000. Subcontractor services, which include the use of a qualified driller is approximately \$61,000. Laboratory costs at \$74,000. Personnel costs to include: Senior Project Manager who will review field work and reporting (50 hours @ \$100/hour = \$5000 in personnel cost.) Administrative costs for submitting reports to be in compliance with overarching grant reporting will be \$2000. The Land Bank anticipates the output for Task 1 to be the compilation of all data in the production of a Conceptual Site Model (CSM) and Risk Assessment. The CSM and Risk Assessment will be used to prepare a TSCA Risk-Based Disposal Application in accordance with 40 CFR 761.61(c).

Task 2, Remediation Planning: (\$20,000): Based on the results of the Site Assessment and Risk Assessment, planning documents used to execute a Remedial Action Plan (RAP) will be prepared. The RAP is expected to include costs for a targeted removal action, along with feasibility planning for alternative remedial activities and the implementation of engineering controls and institutional controls. Activity and Use Limitations will be considered as part of the redevelopment efforts. The estimated cost for an environmental consultant to prepare this analysis is \$20,000. (approximately 100 hours of consultant time @ \$100/hour administered through personnel cost plus contractual project management cost of \$10,000.)

Task 3, Project Management / Oversight: (\$18,000): Includes costs for compliance and progress reporting, project management, budget tracking and revisions, financial reporting at approximately \$5000 for administrative costs, \$5000 personnel cost (100 hours @ \$50/hour) and contractual services of \$5000 for reporting and other eligible activities to support the assessment portion of the project. The budget also includes \$3000 for two persons to attend the national U.S. EPA Brownfield conference. Estimated travel costs include airfare (\$800), hotel (\$1500), meal and incidentals (\$700).

Budget Categories	Project Tasks			
	Task 1: Site Assessment	Task 2: Remediation Planning	Task 3: Project Management / Oversight	Total Grant Budget
Personnel	\$5,000	\$10,000	\$5,000	\$20,000
Administration	\$2,000	\$0	\$5,000	\$7,000
Travel	\$0	\$0	\$3,000	\$3,000
Equipment	\$0	\$0	\$0	
Supplies	\$0	\$0	\$0	
Contractual	\$155,000	\$10,000	\$5,000	\$170,000
Total Budget	\$162,000	\$20,000	\$18,000	\$200,000

3.c. Measuring Environmental Results It is the goal of the Land Bank to complete all tasks and outputs within one calendar year. The Land Bank will track and report initial outputs provided to it by the city of West Carrollton, including weekly data table updates, once the laboratory results become available. Following receipt of all data and all quality control/quality assurance data verification has been conducted, the Risk Assessment and Risk-Based Disposal Application are expected to be completed within the subsequent two months. These documents will be used to determine the remedial strategy, for which a cost and feasibility analysis will be completed. All correspondence, coordination and meetings with the US EPA will be documented and properly memorialized. Once a remedial strategy has been agreed upon and approval granted from the US EPA, the completion of the RAP will be completed within the next month. The RAP will be used to prepare remediation grant funding, if necessary. If benchmarks and scheduled completion dates are not met, a meeting with the Partners and the Environmental Consultant will be conducted to assess any difficulties and/or deficiencies.

4. Programmatic Capability and Past Performance - 4.a. Programmatic Capability

The Montgomery County Land Reutilization Corporation's (the Land Bank) mission is the reuse and redevelopment of distressed real estate. The organization operates six programs to assist county governments and citizens to address the challenges associated with vacant and abandoned properties including Brownfields. To best facilitate the mission, it possesses certain core competencies and contracts with legal and technical experts as necessary. The structure of the effort associated with the awarding of the assessment grant would involve the acquisition of certain technical capabilities to augment those of the organization. Core to the organization's capabilities are maintaining and reporting in a fiduciary role. These administrative and financial capabilities include: accounting, procurement, contracting, contract management and administration, cash management. Oversight of the project's schedule, budget and scope of work will be conducted by the Land Bank to ensure grant compliance, while field activities will be managed under agreement by its partner, the city of West Carrollton (The site's host community.). West Carrollton will be responsible to procure, contract, and manage the sampling activities. Technical assistance to implement the sampling plan, and legal assistance to ensure grant compliance and the assignment of responsibilities will be procured. West Carrollton will also be responsible for ensuring that interested stakeholders and community involvement objectives are achieved.

The Land Bank and West Carrollton have a successful working history having worked together under agreement on similar projects. One project involved the acquisition, demolition and remediation of a former gas station, dry cleaner and car wash facility, which was completed and transferred for reuse as a future medical facility to begin construction in 2020. The Land Bank has also worked with West Carrollton in the demolition of a former paper mill and its redevelopment plan which is now underway. (The property is now a privately-owned volleyball facility.)

4.a.i. Organizational Structure - Land Bank staff include:

Karen Kenwell, Controller: Karen has vast experience in managing state and federal grants including those acquired from federal (Housing and Urban Development, Department of Energy) and state (Ohio Department of Development) sources. She established and managed the Land Bank's accounting system for four years. Currently, Karen's responsibilities include the financial management of eight programs, over 1,300 properties, and approximately \$19M in program income. She has also successfully administered over \$30M in grants with U.S. Department of Energy, ARRA, Economic Development Administration, State of Ohio Jobs Ready Sites, 629 Roadway Fund, and Montgomery County EDGE program. Her role will be to ensure the fund accounting and contracting activities are administered according to grant requirements.

Mike Grauwelman, Executive Director: Mike is responsible for carrying out the Land Bank's mission, formulating its strategies, and building its capabilities. Upon his hiring as the first employee in November 2013, the Land Bank was successful in acquiring and managing \$18.9M in residential demolition funds requiring coordination between communities and establishing a virtual organization to support implementation.

Previously, (1993-2013) Mike was President of Mound Development Corporation. The Corporation's mission was to redevelop and reuse a 300-acre Department of Energy nuclear weapons production superfund site. The corporation was successful in:

- overseeing (as future owner) the completion of a billion-dollar environmental remediation project
- structuring and managing community input to environmental remedies and development activities
- passing three pieces of federal legislation supporting the site's redevelopment
- negotiating the terms and conditions for the site's sale from DOE to Mound Development Corporation
- acquiring, managing and investing \$40M in grant funds to redevelop the site
- constructing the first privately owned building on a former nuclear superfund site
- acquiring title and several EPA No Further Action Letters (issued by area)
- conveying the first parcel of land to private business ownership.

These milestones helped define the site's redevelopment success, achieving the community's vision of a privately owned, economically viable technology and business park. Mike has 40 years in community and economic development experience. He has served on real estate, economic development, and finance boards, and currently serves on the Ohio and Dayton Chapter Boards of the National Association of Industrial and Office Properties, the Ohio Land Bank Association, and the Greater Ohio Policy Center Revitalization Committee.

Susan Considine, Program Manager: She is a highly experienced commercial property manager -managing commercial and industrial properties for over 30 years. During her tenure in real estate management, Susan routinely oversaw a multitude of building renovation and tenant improvement construction projects. The projects involved supervision of multiple trades and multi-million-dollar budgets, coordinating work with building operations, local environmental authorities (EPA, RAPCA, Petroleum Underground Storage Tank Release Compensation Board) as well as municipal building inspection, fire and zoning departments. Susan currently manages the Land Bank's commercial reuse programs in which distressed commercial properties are repositioned for reuse. These activities have involved UST removal and remediation of former gas station sites.

Key Partner City of West Carrollton Staff include:

Mike Lucking, Director of Economic Development: Mike's 36-year public service career includes positions in municipal, county and federal government. His experience includes contract negotiation, planning and community development, economic development and executive level city management. Mike has served on various boards and commissions. Most recently, he served as elected president of the Ohio City Manager's Association.

4.a.iii. Acquiring Additional Resources The Land Bank has its set of procurement policies and procedures that address matters of business conduct, contractor selection, competition, analysis, documentation, statement of work, and representations and certifications. The document ensures the Land Bank utilizes sound business practices, complies with governmental regulations, and conducts procurement efficiently. Environmental counsel has been engaged in the application process, and the project management structure. These procurement practices and engaging support services are incorporated into our processes and culture as a standard for conducting

business - particularly in matters involving environmental liability. Further, the Land Bank utilizes a Request for Qualifications as a means to identify professional services, and expect that its partner organization (West Carrollton) will conduct business honoring Land Bank procedures.

4.b. Past Performance and Accomplishments - 4.b.i. Currently Has or Previously Received an EPA Brownfields Grant The Montgomery County Land Reutilization Corporation (Land Bank) has not received any U.S. EPA Brownfields grants.

4.b.ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements Purpose and Accomplishments: The Montgomery County Land Reutilization Corporation (Land Bank) has not received any U.S. EPA Brownfields funds to date. It has received several funding awards from the Ohio Housing Finance Agency (OHFA) Neighborhood Initiative Program (NIP). The NIP program is financed by the US Department of Treasury Hardest Hit Funds. OHFA is an independent state of Ohio agency that facilitates development, rehabilitation, and financing of housing for low- and moderate-income citizens. The Land Bank has received seven funding awards totaling \$18M since the program's inception. Each additional award was predicated upon milestones (acquisition of property, demolition of units, submission of reimbursement requests) being accomplished.

The program has accomplished the acquisition, survey, remediation, demolition, greening of over 1,100 vacant, dilapidated, abandoned residential structures. Additionally, over 245 of these properties have been transferred to new responsible ownership. The financial impact of removing a blighted structure on the adjacent property is to increase its value by 13% on average. This impact continues radially dissipating according to proximity to the blighted structure.

Compliance with Grant Terms and Conditions: The Land Bank has consistently met or exceeded its obligations under the NIP program. OHFA conducts compliance field inspections / audits on a regular basis to ensure compliance with the program guidelines related to the scope of work. The scope of work includes site acquisition, survey, remediation, demolition, and restoration. In addition, the Inspector General's Office for the Troubled Asset Relief program has audited OHFA for program compliance both financially, administratively, and programmatically. The Land Bank is also audited by the Ohio Auditor of State. The organization has received the Auditor of State Award "for excellence in financial reporting in accordance with Generally Accepted Accounting Principles (GAAP) and compliance with applicable laws" for the 2017 and 2018. (In prior years the organization outsourced its accounting.)

4.b.iii. Never Received Any Type of Federal or Non-Federal Assistance Agreements The Montgomery County Land Reutilization Corporation (Land Bank) has received Federal Assistance Agreements/Grants as noted previously.

Threshold Criteria for Assessment Grants

III.B.1. Applicant Eligibility

The Montgomery County Land Reutilization Corporation (Land Bank) is a "General Purpose Unit of Government" for the purposes of the EPA Brownfields Grant Program incorporated as a nonprofit corporation and an agency of county government under Section 5722 of the Ohio Revised code.

On July 5, 2011, Resolution number 11-1064 was passed by the Montgomery County Board of Commissioners establishing the Montgomery County Land Reutilization Corporation for the county Treasurer's Office, in accordance with Ohio Revised Code Section 5722.02 and authorizing the filing of the initial Articles of Incorporation."

In addition, Resolution 11-1065 was passed "pursuant to Section 1724.10(A)(2) of the Ohio Revised Code designating the Montgomery County Land Reutilization Corporation as the agency for the reclamation, rehabilitation, and reutilization of vacant, abandoned, tax foreclosed and other real property in the county, directing the corporation to act on behalf of and in corporation with the county in exercising the powers and performing the duties of the county under Chapter 5722 of the Ohio Revised Code; directing the participation of an agreement and plan in furtherance of these matters; and authorizing related matters.

The Montgomery County Land Reutilization Corporation was incorporated in the State of Ohio on August 16, 2011, as a "Nonprofit" corporation.

Resolution number 11-1640 of the Montgomery County Commissioners was passed on November 1, 2011, which states "pursuant to Ohio Revised Code Section 1724.10(A)(2) approving and authorizing the execution and delivery of an agreement and plan with the Montgomery County Land Reutilization Corporation as the County's agency for exercising the powers and performing the duties under Chapter 5722 of the Ohio Revised Code of the county the reclamation, rehabilitation and reutilization of vacant abandoned tax-foreclosed and other real property in the county."

The Internal Revenue Service found in its ruling concerning the tax status of the Montgomery County Land Reutilization Corporation dated January 27, 2017, that the organization "is used for a governmental purpose and performs a governmental function." Further the organization "was established by the County as its agent to exercise governmental purposes of reclamation, revitalization, and return to economic productivity of abandoned or foreclosed real estate located in the county. Accordingly, we (IRS) conclude the Taxpayer (Montgomery County Land Reutilization Corporation) is used for governmental purpose and preforms a governmental function." Further the IRS found the state legislature had created, extended and refined the authority of the county to create County Land Reutilization Corporations.

B.3. Expenditure of Assessment Grant Funds

The Land Bank is not a current recipient of an EPA Brownfields Grant of any kind and therefore does not have financial records displaying a funds draw-down.

C. Additional Threshold Criteria for Site-Specific Applications Only

Site Eligibility

1. Basic Site Information

The former Appvion Wastewater Treatment Plant located at 4000 Hydraulic Road, West Carrollton, Ohio 45449, is owned by the city of West Carrollton.

2. Status and History of Contamination at the Site

The former Appvion Waste Water Treatment Plant is contaminated with polychlorinated biphenyls (PCBs) due to historic operational practices. Built in 1960 by Kimberly Clark, the original plant consisted of 2 primary clarifiers, an extended aeration lagoon, and a polishing lagoon with a bleach plant and power boiler added in 1968. Two secondary clarifiers and belt presses were added to the wastewater treatment system in 1980. Over the years, the ownership of the facility has changed several times when Bergstrom Paper Company purchased the Operations in the 1970s; the P.H. Glatfelter Paper Company purchased the Bergstrom Paper Company including the Operations and Treatment Plant in 1979, and after several extended shutdowns in the early 1980s, Appleton Papers became the owners in 1984. In 2012 the name changed to Appvion.

Currently, the site is non-operational with much of the mechanical components removed and buildings vacated. The aeration lagoon pits in the northern section remain and are partially filled with construction debris and seasonal precipitation. The clarifiers remain in place and are typically filled with water.

While the exact extent of contamination will be determined with a complete assessment, a previous study (Johnson Company, Incorporated, 2001), found a portion of the extended aeration lagoon constructed in 1960 was closed and filled with treatment system sludge and soil was excavated when the secondary clarifiers were constructed in 1980. This portion is of concern because of the potential hazardous substances present in the sludge used as fill. Sludge was also used as fill in low areas near the primary clarifiers. The aeration and polishing lagoons constructed at the wastewater treatment plant in 1960 were emptied and lined with clay in the 1970s. It is unknown if the clay was compacted to engineering standards and no monitoring wells were installed to evaluate the migration of process wastewaters away from the lagoons and therefore, it may have migrated to groundwater.

Additionally, according to a Phase II Environmental Site Assessment by the Johnson Company, Incorporated in September of 2001, sludge was identified and detected from the upper 4 feet down to 32 feet below ground surface in all directions, but was not characterized in the southwest where the PCBs were measured in a soil bore at 2,900 mg/kg.

3. Brownfields Site Definition

The former Appvion Wastewater Treatment Plant is not on the National Priorities List and is not subject to any CERCLA regulatory action. It is also not subject in any way to the jurisdiction, custody or control of the U.S. government.

4. Enforcement or Other Actions

The city of West Carrollton has been in continuous contact and coordination with Zack Sasnow, P.E., Environmental Engineer, RCRA Corrective Action and Peter Ramanauskas, RCRA Corrective Action Project Manager/Regional PCB Coordinator, Remediation and Reuse Branch, Land and Chemicals Division, both of USEPA Region 5 regarding the Appvion WWTP project and the known PCB contamination.

After verbally notifying TSCA about the site in 2018, the city, through an unofficial mutual understanding, has been working to address any perceived emergency concerns the EPA had in terms of off-site migration and impacts to the surrounding community and biota. To date, the city, at the direction of TSCA has completed off-site sampling of soils, floodplain areas and river sediments and has determined that there appears to be no significant impact of PCBs outside of the boundaries of the facility.

5. Sites Requiring a Property-Specific Determination

The former Appvion WWTP is a property where there has been a release of polychlorinated biphenyls (PCBs) and the property is subject to TSCA remediation. A Property Specific Determination is attached.

6. Threshold Criteria Related to CERCLA/Petroleum Liability

III.C.6.a. Property Ownership Eligibility - Hazardous Substance Sites

III.C.6.a.i. Exemptions to CERCLA Liability

The Montgomery County Land Bank, as an agency of county government under section 5722 of the Ohio Revised Code, does not own the former Appvion WWTP. They did not arrange for disposal of hazardous waste or in any way contribute to the release of hazardous substances at the site. The city of West Carrollton is allowing access to and working in conjunction with the Land Bank for the purposes of assessment, cleanup and redevelopment of the property into a recreational complex.

III.C.6.a.ii. Exceptions to Meeting the Requirements for Asserting an Affirmative Defenses to CERCLA Liability

The Montgomery County Land Bank does not own the subject property at the time of application submission and in no way caused or contributed to the release of hazardous substances at the site. Additionally, the Land Bank has not disposed of or transported hazardous substances to the site.

III.C.6.a.iii. Landowner Protections from CERCLA Liability

The Montgomery Land Bank is exempt from CERCLA liability as noted in a previous section as they are not the owners of the subject property.

III.C.6.b. Property Ownership Eligibility - Petroleum Sites

III.C.6.b.i. Information Required for a Petroleum Site Eligibility Determination

III.C.6.b.i.1. Current and Immediate Past Owners

Does Not Apply.

III.C.6.b.i.2 Acquisition of Site

Does Not Apply.

III.C.6.b.i.3. No Responsible Party for the Site

Does Not Apply.

III.C.6.b.i.4. Assessed by a Person Not Potentially Liable

Does Not Apply.

III.C.6.b.i.5. Judgments, Orders, or Third-Party Suits

Does Not Apply.

III.C.6.b.i.6 Subject to RCRA

Does Not Apply.

III.C.6.b.i.7. Financial Viability of Responsible Parties

Does Not Apply.

III.C.7. Waiver of the \$200,000 Limit

The Land Bank is not requesting a waiver of the \$200,000 limit.

**Brownfield Grant Site Specific Determination
Former Appvion Waste Water Treatment Plan
4000 Hydraulic Road
West Carrollton, Ohio 45449**

- 1) **Site identification information:** Former Appvion Wastewater Treatment Plant, 4000 Hydraulic Road, West Carrollton, OH 45449
Eligible Entity Identification Information: The Montgomery County Land Reutilization Corporation, Land Bank, is a nonprofit corporation and an agency of county government under section 5722 of the Ohio Revised code.
- 2) **The specific circumstance that requires the grant recipient to request a property-specific determination:** The Appvion Wastewater Treatment Plant (WWTP) property had an historic release of polychlorinated biphenyl (PCBs), which are subject to remediation under the Toxic Substance Control Act (TSCA). The subject property was used as a paper sludge and slurry wastewater treatment plant (WWTP) for more than five decades. As a result of de-inking of carbonless paper through the early 1970s, PCB contaminated wastewater and sludge were generated and subsequently processed at the WWTP where it was deposited in the southern one-third of the subject property. The Land Bank is seeking a Brownfields Assessment Grant for the purposes of characterizing and determining the PCB contaminated sludge.
- 3) **A short explanation of why the site falls within the identified circumstance requiring the property-specific determination:** The owner of the subject property, the city of West Carrollton (City), has submitted a Self-Implementing Plan (SIP) for disposal, specific to a portion of the property, to the U.S. EPA in accordance with 40 CFR 761.61(a) of the Toxic Substances Control Act. The SIP was submitted to obtain approval for disposal of PCBs in what is identified as Pit 1 of the subject property. Pit 1 is located in the northern one-third of the subject property and is a former wastewater aeration lagoon. Pit 3, located in the south-central portion of the property, is the former sludge disposal area, which will be the primary focus of future assessments and remediation, for which Brownfields funding is being requested.
- 4) **An explanation of how providing brownfields funding for the site will meet the criteria necessary for making a property-specific determination:** The Brownfields Assessment Grant funding will allow a thorough site assessment of the extent of PCB contamination so that a determination of the most expedient way in which to remediate the site can be developed with the approval of US EPA TSCA. Removal and engineering and/or institutional controls may be utilized to create a location that will protect human health and is ideal to construct a recreational athletic complex for community use. Based on historic sampling data (JCI, 2001) indicating PCB contamination in Pit 3 exceeds levels considered acceptable for disposal in place, the City, via the Land Bank, is proposing a more structured and thorough investigation of this area to fully characterize the nature and extent of impact. Due to the anticipated magnitude of effort required to investigate, characterize and remediate the PCB contamination and based on the limited fiscal resources of the Land Bank, Brownfields funding is an essential component. This will then allow the Land Bank to

assist West Carrollton in addressing and/or mitigating the impacted areas and reduce the potential exposure through the most efficient methods necessary including removal (if necessary), encapsulation, engineering controls and institutional controls to protect human health and the environment. The intended long-term land use for the entire former wastewater treatment plant is that of a destination sport recreation complex.

a. Protection of Human Health and the Environment

Brownfields assessment grant funding will allow a thorough property characterization and risk assessment of the WWTP, allowing the Land Bank and City to prepare and execute a U.S. EPA TSCA approved remedial activity (as deemed appropriate), to reduce concentrations or eliminate exposure pathways to the PCB, thereby protecting human health and the environment. Based on historic sampling data collected as part of a 2001 limited subsurface investigation (JCI, 2001), PCB concentrations at near surface locations (0'-4') have been reported at levels exceeding 400 milligrams per kilogram (mg/kg). These concentrations exceed the United States Environmental Protection Agency (US EPA) Regional Screening Levels for a residential scenario of 0.35 mg/kg for a direct contact exposure pathway and 0.88 mg/kg for an ingestion exposure pathway. PCB contaminated sludge and/or soils exist in the southern one-third of the Former Appvion WWTP, known as Pit 3.

b. Promote Economic Development or the Creation of, Preservation of, or Addition to Parks, Greenways, Undeveloped Property, other Recreational Property, or Other Property Used for Nonprofit Purposes

As part of a Montgomery County economic development plan, the Land Bank is assisting West Carrollton city leaders with the master economic development plan; an aggressive approach in acquiring and redeveloping extensive blighted and underutilized property, including former industrial, retail and commercial facilities. Many of the transactions have been facilitated with the assistance of the Land Bank. West Carrollton's plan for the WWTP is to redevelop the land, through public and private partnerships, into a destination sports and recreation complex. Additional lands, currently in agricultural use, will be combined with the remediated WWTP lands into a soccer facility capable of hosting large-scale national tournaments, and serving the local and regional needs for a high-quality athletic establishment. A residential neighborhood, Montgomery County bike path, and Miami River are adjacent to the southern border of the former WWTP. Assessment and cleanup will significantly mitigate the possibility of children and/or adults to gain access to the facility through a breach of the fence or through possible trespassing of the property.

The initial economic impact will be related to the construction stimulus and resulting local income and sales taxes. The long-term, sustainable and permanent impacts to broaden the tax base will be realized through the tourism, travel and retail expenditures and resulting sales taxes generated by popularity of youth soccer in Ohio, the Midwest region and nationally. The WWTP currently comprises approximately 27.2 acres, valued by the county at approximately \$144,000, or \$5,333 per acre. In comparison, a 58-acre, fully developed facility, Ankeney Soccer Complex, located in the nearby community of Beavercreek, Ohio, is currently assessed at approximately \$18,600 per acre. Based on this comparison, it's

conceivable that property values and the resulting property taxes would increase three-fold for the subject property and surrounding area.

c. Description of Recreational Area

The current configuration of the WWTP includes two large, open pits (Pits 1 and 2), that are between 600 and 1,000 feet in length, approximately 120 feet in width and 15 feet deep. The majority of the PCB sludge and waste, located in Pit 3, is undulating, uneven and will likely require a removal action as part of the final remedial effort. In addition, two large former clarifiers are located in the southwestern and southeastern corners of the property, with several concrete block and metal framed structures situated near the entrance along the eastern property boundary. Significant site preparations in the form of demolition, grading and filling will be necessary to accommodate the reuse. None of preparation activities can commence until the WWTP has been properly characterized and remediated, for which the Brownfields funding is necessary.

Once developed, the complex will not only provide high quality, well maintained, state of the art surfaces for soccer and other outdoor sports, but will be comprised of several structural improvements to enhance the visitor, worker, player and spectator's experience.

- 5) **The degree to which other funding is or is not available for the assessment or cleanup of the site:** The Ohio EPA operates a Targeted Brownfields Assessment (TBA) program, whereby funds of approximately \$30,000 are available, based on certain eligibility requirements, for which the Montgomery County Land Bank would qualify. Funding services include Phase I environmental site assessment, asbestos surveys, geophysical surveys, and limited or supplemental phase II property assessment. The limited phase II property assessment provided by the Ohio EPA may help to supplement, but not replace, Brownfields Grant funding required. An estimated \$180,000 is needed to adequately assess and characterize the PCB contamination vertically and horizontally throughout the property.
- 6) **An explanation of whether or not the applicant/recipient is responsible for the contamination at a site.** West Carrollton acquired the subject property in 2015 from Appvion without conducting pre-purchase environmental due diligence so as to satisfy the requirements of All Appropriate Inquiry under CERCLA. As such, the Land Bank, which has never owned, operated or had any financial or equity interest in the subject property nor has been affiliated or had ownership interest with any of the potential responsible parties, will be the applicant and recipient of funding. As West Carrollton is not the applicant, they are cooperating with the Land Bank and have stated they will allow access to the property for the duration of assessment.

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

12/03/2019

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: MONTGOMERY COUNTY LAND REUTILIZATION CORPORATION

* b. Employer/Taxpayer Identification Number (EIN/TIN):

* c. Organizational DUNS:

0864387860000

d. Address:

* Street1: 130 W SECOND STREET

Street2: SUITE 1425

* City: DAYTON

County/Parish: MONTGOMERY

* State: OH: Ohio

Province:

* Country: USA: UNITED STATES

* Zip / Postal Code: 45402-1516

e. Organizational Unit:

Department Name:

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: * First Name: MICHAEL

Middle Name:

J

* Last Name: GRAUWELMAN

Suffix:

Title: EXECUTIVE DIRECTOR

Organizational Affiliation:

* Telephone Number: 937-531-6921

Fax Number:

* Email: mikeg@mclandbank.com

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-19-05

* Title:

FY20 GUIDELINES FOR BROWNFIELD ASSESSMENT GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

Montgomery County Land Reutilization Corporation
City of West Carrollton's Assessment Grant Program

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:**

* a. Applicant

10

* b. Program/Project

10

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

10/01/2020

* b. End Date:

09/30/2023

18. Estimated Funding (\$):

* a. Federal	200,000.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	200,000.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☒ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☐ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:

* First Name:

Michael

Middle Name:

* Last Name:

Grauwelman

Suffix:

* Title:

Executive Director

* Telephone Number:

937-531-6921

Fax Number:

* Email:

mikeg@mclandbank.com

* Signature of Authorized Representative:

Karen L Kenwell

* Date Signed:

12/03/2019